

**COMMONWEALTH OF MASSACHUSETTS**  
**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department on its own motion into the appropriate regulatory plan to succeed price cap regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts' retail intrastate telecommunications services in the Commonwealth of Massachusetts

DTE 01-31

**AT&T'S SIXTH SET OF INFORMATION  
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. hereby submits to Verizon Massachusetts the following information requests. Please provide responses to these requests as they are completed.

Instructions

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

## INFORMATION REQUESTS

Refer to Reply To Surrebuttal Testimony of William E. Taylor, dated November 14, 2011, pp. 9-11, wherein Mr. Taylor purports to provide an example from the long-distance telecommunications market in which “prices systematically exceed marginal costs.”

1. Please provide all workpapers, data, and analyses on which Mr. Taylor bases his conclusion that rates paid by AT&T customers exceed the incremental costs of providing the service. Please include in your answer all workpapers, data, and analyses supporting the subsidiary conclusions that

(a) “AT&T’s marginal costs of serving residential customers totaled \$0.07 to \$0.11 cents per conversation minute, depending upon whether one counts marketing expenses or not”,

(b) “the average rate paid by AT&T residential customers was about \$0.20 per conversation minute.”

Please identify all data sources. Please identify all assumptions made and provide support for each such assumption. Please include in your answer a detailed description of how the sample of residential bills was selected, including how the universe of bills was identified, how the time period for such universe was identified, and the method used for selecting from that universe the bills that were part of the sample.

2. Please provide all workpapers, data, and analyses on which Mr. Taylor bases his conclusion that “LECs charged an average of \$0.06 per conversation minute for carrier access and other fees whose incremental cost is less than \$0.01 cent per conversation minute (\$0.005 per access minute).” Please identify all data sources. Please identify all assumptions made and provide support for each such assumption.
3. Please identify all sources of funding for the analyses that Mr. Taylor conducted and the analyses that Mr. Taylor relied upon to reach the conclusions set forth on pages 9-11 of the above referenced testimony.

Respectfully submitted,

AT&T COMMUNICATIONS OF  
NEW ENGLAND, INC.

By its attorneys,

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Jeffrey F. Jones  
Kenneth W. Salinger  
Jay E. Gruber  
Katherine A. Davenport  
Palmer & Dodge LLP  
111 Huntington Avenue  
Boston, MA 02199  
(617) 239-0100

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